

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS

**1:05-cr-10081-MLW-ALL**

**UNITED STATES OF AMERICA**

**v.**

**ALEX S. NEWMAN**

**DEFENDANT'S MOTION TO EXTEND TIME FOR FILING**  
**REQUESTED JURY INSTRUCTIONS**

Now comes the Defendant, through counsel, and respectfully moves for an extension of time within which to file his Requested Jury Instructions to January 6, 2006.

In support of the within motion, counsel states that she has been unable to meet the established deadline, despite her best efforts, due to intensive efforts to obtain documents and computer equipment that was believed to have been lost or destroyed until recently.

Respectfully submitted,  
Alex Newman  
By his attorney,

/s/ Juliane Balliro  
Juliane Balliro (BBO#028010)  
WolfBlock  
One Boston Place  
Boston, MA 02108  
617-226-4000

Dated: January 6, 2006

**Certificate of Service**

I hereby certify that, on January 6, 2006, I caused a copy of the foregoing to be filed electronically and via electronic mail to:

**AUSA Robert M. Kinsella**  
53 Pleasant St., 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
robert.kinsella@usdoj.gov

/s/ Juliane Balliro  
Juliane Balliro